

# KING & SPALDING

January 21, 2025

**VIA ECF AND EMAIL**

Hon. Richard J. Sullivan, U.S. Circuit Court Judge  
U.S. Court of Appeals for the Second Circuit  
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**Re: Oakley v. MSG Networks, Inc., et al.; Case No. 17-cv-06903 (RJS)**

Dear Judge Sullivan:

We write on behalf of the MSG Defendants (collectively, "MSG") pursuant to Rule 3 of Your Honor's Individual Practices and Rule 5.2 of the Federal Rules of Civil Procedure, concerning MSG's submission of two exhibits comprising portions of records that AT&T produced to MSG. In the as-filed versions of those exhibits, we redacted cell phone numbers belonging to Oakley and individuals with whom he sent or received text messages. Accordingly, MSG requests leave to file unredacted versions of these exhibits under seal.

As always, we appreciate the Court's consideration.

Respectfully submitted,

/s/ Randy Mastro

Randy M. Mastro

Defendants' request to file the unredacted telephone records under seal is GRANTED. The Court finds that the presumption in favor of open records has been outweighed by the privacy interests of Oakley and the individuals with whom he corresponded via text message. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). The Clerk of Court is respectfully directed to terminate the motion pending at Doc. No. 271.

**SO ORDERED:**

**Dated:** 1/22/25



**RICHARD J. SULLIVAN**  
U.S.C.J., Sitting by Designation